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Subject: Final Report
Project Director(s): Cozzens, Susan
Telephone No.: 404-385-0397
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"Strategic Sustainability Policy Impediments
Period Covered: 9/26/2004 – 2/28/2004

The subject report is forwarded in conformance with the contract/grant specifications.

Should you have any questions or comments regarding this report(s), please contact the Project Director.

Sincerely,

Kamie Cunningham
Date Entry Specialist

Addressee: 1 copy

M-26-609
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MEMORANDUM

TO: John Fittipaldi, Contracting Officer's Representative, AEPI

FROM: David Eady, Senior Research Associate, GT SPP-TPAC

DATE: 15 October 2003

SUBJECT: Report on Consulting for AEPI

This memo serves as the final report to the Army Environmental Policy Institute (AEPI) in accordance with purchase order **DACA01-03-P-0041**, "Strategic Framework for Integrating Sustainability Considerations into Stationing Planning and Analysis". It describes consulting services provided to AEPI during the performance period, 15 July to 14 October 2003. We conducted these activities in close coordination with The Army Basing Study (TABS) Group, office of the Deputy Assistant Secretary of the Army (DASA) for Infrastructure Analysis (IA). Our objective was to develop a strategy to integrate environmental and other resource sustainability factors into analyses supporting Army stationing analysis and basing decisions. This work formally began with a coordination meeting with the TABS Group, specifically COL Bill Tarantino and LTC Greg Fleming, on 25 July 2003.

The execution schedule submitted with the Project Management Plan was as follows:

- ✓ 24-25 July: Meet with TABS office to discuss requirements for TABS
- ✓ 28 July-11 August: Prepare draft strategy to address sustainability within TABS
- ✓ 11-27 August: Coordinate with Army environmental professionals
- ✓ 28 August: Facilitate TABS meeting on environmental factors to address in TABS
- ✓ 29 August-12 September: Develop after-action memo and propose follow-up
- ✓ 15-17 September: Conduct follow-up meetings with subject matter experts
- ✓ 25 September: Facilitate 2nd TABS meeting on environmental factors
- ✓ 30 September: Complete strategy for integrating sustainability within TABS

Due to nondisclosure requirements, this report does not include details regarding data requirements and methods. Rather, it describes the activities leading to the development of a strategy for integrating environmental (and, more broadly, sustainability) considerations into stationing planning and analysis. Details are documented elsewhere and provided to the sponsor (i.e. AEPI) and DASA(IA)/TABS office.

In August and September, we involved numerous subject-matter experts (SMEs) within the Army (from ODEP, AEC, CERL, CHPPM, HQ Corps of Engineers, and NGB), and from the other services, in a facilitated process to identify environmental factors for the baseline data for stationing analyses. We met for the first time as a complete group on 28 August 2003 at the TABS office Rosslyn, Virginia.

As a first step, prior to meeting with SMEs, we created an Excel spreadsheet to sort through the various environmental and "encroachment" factors discussed/assessed previously in different contexts and methodologies. For instance, the spreadsheet included factors from the "Environmental Climate Model" (ECM), the "Sustainable Installation Regional Resource

Assessment" (SIRRA) methodology, 1995 Base Realignment and Closure (BRAC) Environmental Baseline documents, Installation Status Report (ISR) encroachment assessment, SROC "encroachment" issues, etc. We then prepared a PowerPoint version of the spreadsheet to facilitate our discussion, but we shared the "once-over-the-world" spreadsheet display in the interest of transparency and comprehensiveness in our approach.

There are two worksheets in this initial Excel file. The first, "Crosswalk of Factors," is an initial display of the various factors, which attempts to identify commonalities. It includes all noted (and somewhat relevant) factors. The second, "Factor Types & Data Elements," is the one used as basis for our 28 August meeting. As we began to note the actual "indicators" or measures proposed for each factor or sub-factor, which varied for each "methodology" or list in many instances, we amended the list of factors to account for the different measures. We also grouped the factors into 25 (imperfect) categories.

In putting together the spreadsheet, we avoided making value judgments about the factors and data elements. We structured the spreadsheet to allow us to review each factor and associated data elements based on TABS criteria: Are they (1) measurable, (2) available, (3) reliable, (4) certifiable (by auditors), and (5) distinguishable (at the installation level—i.e., it varies among installations). We looked for those environmental/sustainability factors that best contribute to an analysis of "Military Value" and "Capacity" within the TABS analytical process. Some cost factors were noted as part of the baseline development, such as environmental program costs, UXO clearance costs, land maintenance costs, etc., but these costs are accounted for elsewhere in the TABS process.

With respect to military value, we looked primarily at which factors best contribute to an overall assessment of each installation's *capacity* and *elasticity*: What missions and to what extent can it sustain today from a resource perspective (stated as its capacity), and what flexibility does it have to change its capacity for better or worse in the future. This latter attribute (elasticity) speaks to the possible/likely impact on an installation from "encroachment" over time and its relative ability to mitigate that impact so as to maintain or expand mission capabilities over time. Many factors contribute to an overall assessment of an installation's elasticity, such as changes in habitat designations, increases in infrastructure capacity, reductions in resource consumptions, etc.

Steve Siegel (Energy and Security Group) and I met with other subject matter experts from US Army Center for Health Promotion and Preventive Medicine (USACHPPM), US Army Environmental Center, and US Army Engineering Research and Development Center (ERDC) on 15-16 September 2003. From these meetings we developed a robust list of candidate data elements and measures for the BRAC 2005 environmental baseline. We then presented these factors to the original group in a meeting on 2 October 2003 during which time the list was refined and transmitted to the TABS Group.

We distributed the draft of the Environmental Baseline questions, prepared by the TABS Group, to participants for final review in December. These baseline questions are derived primarily from meetings with the "environmental community" on 28 August, 15/16 September and 2 October 2003. Representatives from the other Services also added attributes to the environmental baseline data call. In October 2003 the Environmental Support Office (ESO) to the Assistant Secretary of the Army (ASA) for Acquisition, Logistics and Technology (ALT) provided us with an opportunity to comment on its recommendations for environmental factors to the Joint Services Integration Group (JSIG) for industrial processes. ESO based its recommendations on factors discussed/developed during meetings referenced above.

Through email exchanges in September 2003 with COL Bill Tarantino, Chief of the Modeling Support Team within the TABS Group, we also discussed the value in conducting a strategic environmental assessment (SEA) for alternative stationing scenarios. It is my opinion that there is considerable value in conducting a strategic level environmental impact assessment (EIA) for stationing/BRAC scenarios.

Mainly there is a cost avoidance that results from considering the implications of the various courses of action—as is done under a traditional site-specific or project-level EIA—at a strategic level of planning and analysis, before decisions are made and resources are committed. This approach allows installations impacted by stationing actions or BRAC decisions to "tier" their EIAs off the strategic-level analysis. This reduces redundancies and focuses only on the site-specific details that were not captured at the lower resolution of a "higher order" impact assessment.

It may not change the answer, but a strategic EIA will allow for more informed decisions, which is the intent of the National Environmental Policy Act (NEPA). For instance, in our discussions with air specialists at the US Army Environmental Center (AEC), the issue was raised about emission sources associated with a given unit that may be moved. The additional emissions from that unit may trigger a regulatory threshold under the Clean Air Act that sends the whole installation into another management regime, thereby translating into additional costs the Army may not wish to bear.